

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #13
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Thomas Budroe, OSC

Date: 10/30/2018

Reporting Period: 10/30/2018

1. Introduction

1.1 Background

Site Number:	A28U	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/17/2018	Start Date:	10/17/2018
Demob Date:		Completion Date:	
CERCLIS ID:	NYD088413877	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility

shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

All boiler and process operations necessary to treat the contaminated aqueous waste streams stored/generated on-site are continuing. Most of the weak ammonia liquor in the north tank has been treated. The Ammonia Still System was reduced to 30 gallons per minute in the morning to avoid running the North Tank dry prior to pumping the weak ammonia liquor up from the South Tank. During the evening the Ammonia Still System was further reduced to 20 gallons per minute. A rented pump and hose will be on site on Thursday, November 1, 2018, to plumb a temporary means to transfer the weak ammonia liquor to the north tank.

EPA's technical contractor collected three drum samples in support of the Site assessment.

Two cleanup technicians were mobilized to the Site to aid in the cleanup operations. Empty 55-gallon steel and poly drums, PPE and a skid steer with both forks and a bucket were also mobilized to the Site. The materials in a building north of the process area were rearranged and the building subsequently used to store the new supplies.

The OSC conducted a reconnaissance of the three tanks in Site 108 reportedly containing coal tar. The upright steel tanks which are situated roughly in a row running east to west are in very poor condition. All of the tanks are surrounded by earthen berms which vary in height, width and condition. In general, the berms are approximately five feet high and nine feet at the base. The two western most tanks are in the same containment area while the third tank to the east is in a separate containment area. The floor of the containment could not be seen but is presumed to consist of soil. The grade in the area around the tanks is variable. The western most tank has been cut around the horizontal circumference approximately nine feet above grade. It could not visually be determined what may remain in this open tank. The sides of the center tank are intact however approximately 50 percent of the tank ceiling is gone. The water in the containment area surrounding these two tanks contained no sheens with the exception of the north side of the center tank. A pipe connected to a damaged valve on north side of the center tank has been cut and a drop of black material on the lip of the pipe evidenced it may have leaked some material into the water below. A black material was on the surface of the water in this area. Cut pipes and poly sheeting were also littering this area of the berm and containment water. The third tank has three large holes cut into the sides but was otherwise intact. A liquid material was observed inside the tank but could not be visually identified. The material inside the tank was approximately 1.5 feet below the bottom of one of the holes. No sheens were observed in the containment water but the water was cloudy.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

1. Continuing operating the boiler and supporting systems.
2. Continue running the Ammonia Still System to treat the weak ammonia liquor and other generated aqueous waste.
3. Continue to pump the contaminated water from the containment and sump areas for treatment in the Ammonia Still System.
4. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
5. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
6. Continue to maintain and monitor both the plant process water and the surface storm water systems
7. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
8. Clean and subsequently remove the plant process containment areas.

2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$550,000.00	\$0.00	\$550,000.00	100.00%
Intramural Costs				
Total Site Costs	\$550,000.00	\$0.00	\$550,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

One OSC, 11 ERRS personnel and two RST3 personnel.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.